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COSCO BEIJING INTERNATIONAL
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MED-ASIA SHIPPING LTD.,

Plaintiff,

-against-

COSCO BEIJING INTERNATIONAL
FREIGHT CO., LTD.,

Defendant.

07 Civ. 9624 (RMB)

**NOTICE OF MOTION FOR
COUNTERSECURITY PURSUANT TO
SUPPLEMENTAL RULES E(7) AND/OR
FOR SECURITY FOR COST PURSUANT
TO SUPPLEMENTAL RULE E(2)(b)**

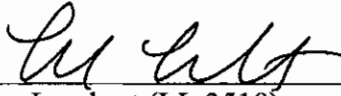
PLEASE TAKE NOTICE that upon the Affidavit of LeRoy Lambert., dated February 7, 2008, Defendant's Memorandum of Law, and all prior pleadings and papers filed in this action, Defendant will move this Court on February 19, 2008, or as soon thereafter as counsel may be heard, pursuant to Rule E(7) and/or Rule E(2)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, for an Order requiring Plaintiff Med-Asia Shipping Ltd. to provide countersecurity and/or security for costs in the amount of \$100,000.00 to Defendant and for such further and other relief as to the Court seems just and equitable.

PLEASE TAKE FURTHER NOTICE that Plaintiff's opposition papers shall be served on or before February 14, 2008 and Defendant's reply papers shall be served on or before February 19, 2008.

Dated: New York, NY
February 7, 2008

Respectfully submitted,

BLANK ROME, LLP
Attorneys for Defendant
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By 
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